

LAVIN, CEDRONE, GRAVER, BOYD & DISIPIO
Formed in the State of PA
Regina Cohen
Suite 500 190 North Independence Mall West 6th & Race Streets
Philadelphia, PA 19106
Tel: (215) 351-7551
Fax: (215) 627-2551
E-mail: RCohen@lavin-law.com
Attorney for Movant

ATTORNEY FOR MOVANT: ALLY CAPITAL

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN DIVISION**

IN RE:	§	CASE NO. 22-19628-ABA
ORBIT ENERGY & POWER, LLC, Debtor	§	CHAPTER 7
	§	
	§	Hearing Date: May 14, 2024 @ 10:00 A.M.

**STATEMENT AS TO WHY NO BRIEF IS NECESSARY IN
ACCORDANCE WITH LOCAL RULES OF BANKRUPTCY PRACTICE**

The within Notice of Motion requests relief from the automatic stay on the grounds, as set forth on the accompanying Certification, that the Movant has a perfected security interest in the motor vehicle owned by the Debtor Orbit Energy & Power, LLC and there has been a default

As the facts the Movant relies upon, as set forth on the accompanying Certification, and the basis for relief from the automatic stay, do not present complicated questions of fact or unique questions of law, it is hereby submitted that no brief is necessary in the Court's consideration of the within Motion.

Respectfully Submitted,

Lavin, Cedrone, Graver, Boyd & DiSipio
Attorney for Movant

Dated : April 17, 2024

/s/ Regina Cohen
Regina Cohen